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United States Government

Department of Energy

Rocky Flats Office

# memorandum

DATE: MAY 25 1990  
REPLY TO  
ATTN OF: EPD:MEVDP:6636  
SUBJECT: Sewage Treatment Plant (STP) Federal Facility Compliance Agreement (FFCA)  
(Your Memo, 5/9/90, 90-RF-2024)  
TO: Jack Kersh, Associate General Manager  
Environmental Restoration & Waste Management  
EG&G Rocky Flats, Inc.

We are pleased that you have begun implementation of the draft FFCA. Your comments and concerns are well founded, and although previously discussed with your staff, are deserving of specific guidance from the Rocky Flats Office (RFO).

As you may know, following the chromic acid incident both Rockwell International and the U. S. Department of Energy (DOE) conducted investigations of the incident and identified actions necessary to prevent recurrence and/or otherwise necessary to improve operational conditions. On May 8, 1990, Rockwell issued the document entitled "Chromic Acid Incident Corrective Action Plan," to address the Rockwell report. No similar document was prepared for the DOE report, which as your letter suggests, was never officially transmitted to Rockwell. As noted in paragraph four of your letter, reconciliation of the two documents is necessary; therefore, please proceed with the effort now underway to develop action plans for each of the items noted in Sections 5.4 and 5.5 of the DOE document entitled "Report of the Chromic Acid Incident Investigation at Rocky Flats" (attached). Where possible, the action plans developed in response to this request may parallel those developed for the Rockwell action plan. However, each of the needs or concerns raised in the DOE report must be met and addressed. The format of the "Tiger Team" action plans are preferred, with the inclusion of budget (Five Year Plan) Activity Data Sheet (ADS) numbers. P&S efforts should also be related to a base program ADS, if possible, or otherwise identified. Also, we ask that a signature line be identified for both EG&G and RFO approval of each of the specific action plans, and for approval of action item close-out.

Please note that we have asked EG&G to prepare action plans for all, not just "appropriate" needs and concerns raised in the DOE report. We are not asking for your organization to prepare complex action plans for findings without tangible measurements (see, for example, item 28 on page 148 of the DOE report). However, some documentation needs to be prepared which addresses each finding and shows that you have reviewed, corrected, or shown as inappropriate each of the findings. RFO can then review your action plan documentation and approve close-out, where warranted. Also, if better solutions than those identified by the DOE team can be identified, as your staff has suggested with respect to the plating laboratory, please identify such thoughts in your response.

ADMIN RECCRD

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IA-A-000307

J. Kersh

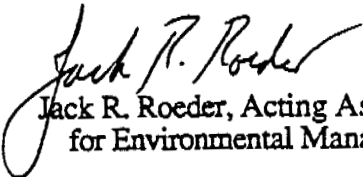
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Finally, we recognize that the development and implementation of this plan will likely identify more problems needing correction. Such problem identification is appropriate. Please ensure that schedules for corrective actions are consistent with the DOE budgetary cycle.

Your skeletal draft timeline shows progress towards documenting understanding of the FFCA requirements. However, please add under the column for funding source the actual ADS number or appropriate P&S funding source identifier, and under the schedule a separate column for FFCA action item due date.

We hope this memorandum helped resolve all of your concerns, if not, please feel free to contact me or Tom Lukow of my staff on extension 4561.

  
Jack R. Roeder, Acting Assistant Manager  
for Environmental Management

Attachment

cc w/o Attachments:  
D. P. Simonson, DOE/RFO  
M. E. Van Der Puy, EPD/RFO  
F. Hobbs, EG&G/RF